Hello,

I am opposed to RM-10352. In general, I think that the regulation of the amateur bands is already overcomplicated as it is, and generally it should either be left alone, or reduced and simplified. Forcing the FCC to deal with the details of the various amateur modes any more than they already do is a waste of FCC time and government money.

If there is interference from phone and image modes on the 160 meter amateur band, it is because there is a great deal of interest and operation in these modes. Amateurs should be able to fit into the available spaces as they always have. Cases of deliberate interference are a different issue. These should be handled in a regulatory fashion, as they always have.

However, if the low end of 160 MUST be carved into mode-specific ranges, I would suggest there should be at least as much exclusive space allocated for the digital modes as for CW, given the present popularity of PSK-31 and other such digital text modes.

Please note that I am suggesting this ONLY if the band MUST be carved up by regulation: I would suggest something like 1800-1815 for CW only, 1815 to 1830 for digital only, and 1830 - 1995 for phone, image, etc, only (no CW, except possibly for a brief signoff in the event of equipment trouble), and a segment for low-power and experimental modes only (no CW) at the very top of the band, 1995-2000. Please note that this is not my first preference, but a fallback position; I prefer to leave the 160 meter regulations as they are now.

Sincerely,

Robert E. Bruhns, WA3WDR